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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

11 NUCLEAR CARE PARTNERS, LLC, a Nevada
12 limited liability company,

13 Plaintiff,

14 vs.

15 THOMAS M. GLEASON, a/k/a TOM
16 GLEASON, an individual,

17 Defendant.

Case No.: 2:15-CV-01418-APG-CWH

**STIPULATION RE EXTENSION OF
TIME TO REPLY TO DEFENDANT'S
RESPONSE TO MOTION FOR
PRELIMINARY INJUNCTION**

(First Request)

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19 WHEREAS, plaintiff has recently filed this action and has filed a Motion for Preliminary
20 Injunction seeking an order that, among other things, would preclude defendant from using
21 plaintiff's alleged trade secrets (the "Motion") (Doc. 8).

22 WHEREAS, the parties entered into a stipulation wherein Defendant would have an
23 enlargement of time to respond to the Motion until September 1, 2015, which was approved by
24 the Court.

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26 WHEREAS, under the normal timeframes set forth in the local rules, defendant's reply
27 brief would be due September 11, 2015.

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1 WHEREAS, undersigned counsel is working with local counsel in Grand Junction,
2 Colorado, where Plaintiff is located, to coordinate the briefing on the Motion for Preliminary
3 Injunction and required affidavits, exhibits, etc.

4 WHEREAS, Plaintiff's Grand Junction, Colorado Counsel is currently out of the office
5 attending a multiple week jury trial in the Rio Grande County, Colorado, District Court, and is
6 unavailable to assist in finalizing the briefing and accompanying affidavits and exhibits thereto
7 with Plaintiff.

8 WHEREAS, the parties hereto have agreed to postpone the deadline for plaintiff's reply
9 brief by one week in order to ensure the availability of Colorado counsel for participation in
10 preparing the reply briefing.

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1 THEREFORE, the parties stipulate that the deadline for plaintiff to file its reply brief in
2 support of the Motion shall be September 18, 2015.

3 Dated this 11th day of September, 2015.

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5 **ALVERSON TAYLOR MORTENSEN & SANDERS**

6 //s// Adam R. Knecht

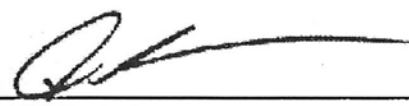
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15 **DURHAM JONES & PINEGAR**

16 //s// Michael Rawlins

17 _____
18 Michael Rawlins, Esq.
19 Nevada Bar No. 5467
20 10785 W. Twain #200
21 Las Vegas, NV 89135
22 *Attorneys for Defendant*

23 IT IS SO ORDERED.

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25 _____
26 UNITED STATES DISTRICT JUDGE
27 Dated: September 14, 2015.

28 N:\kurt.grp\CLIENTS\22900\22914\pleading\stip2cont reply brief deadline.docx

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